

Development Control Committee 10/04/17

Application CM/51/15: Mineral Extraction from land North of North Park

We accept that gravel reserves need to be extracted, in this case the application by CEMEX UK Operations Ltd to extract an estimated 2 million tonnes of sand and gravel from a green belt site lying to the north of North Park, Richings Park, Iver. However, we believe that the proposed scheme has several flaws which require a refusal of the application as it stands. Our reasons are set out below.

Proximity to residential properties

The proposed site for extraction of minerals lies close to the western borders of Richings Park.

- Properties adjacent to the site in Bathurst Walk are just **40 metres** from the working margins of the site; many in Syke Cluan, St James' Walk and North Park are within approx. 100 m.
- Thus excavation works will occur unacceptably close to properties in Bathurst Walk and the proposed mitigation measures are inadequate.

Concrete manufacturing plant

The proposed 16 metre high, concrete manufacturing plant would be within 200-250 metres of properties in North Park and in view of many other properties. The plant is included in the proposal purely for commercial reasons. It is unnecessary for the extraction of minerals and there are already a number of cement plants in the area to provide for local need.

The 16 metres high concrete plant would be illuminated. The landscape assessment (Para 13.12 (p87) of the main application) concludes "*there are no properties with major, close, direct and open views of the application area*" but that "*There will be intermediate and minor views of the application site and operations, but with the advance planting, bunds and position of the plant site the visual and landscape impacts of the working will be minimised.*". These are misleading statements.

- Indicative sight lines show that the concrete plant will be visible to many properties over a considerable distance, especially at night.
- Illumination of the plant during working hours includes considerable periods during the winter.
- At the nearby Datchet site, the concrete plant often remains illuminated for 24 hours, despite assurances of limiting it to working hours.

Para. 8.3, Table 1 (p19) of the Planning Statement seems to suggest that concrete production would commence before extraction of minerals, implying that supplies would be imported. This unacceptable industrial use of green belt land and would generate further HGV movements.

Traffic analyses in Appendix 4, Para 4.16 (p14), conclude "*By locating a concrete batching plant on site, the amount of extracted mineral that needs to be taken off site is reduced by 120,000t/annum than would otherwise be the case if it had to be transported to a concrete plant elsewhere. This equates to a saving of 12,000 HGV movements per year and represents a more sustainable operation than having the concrete batching plant located remotely from the site.*"

- This is an inaccurate statement. The mineral will still be transported off-site, but in the form of concrete. Since less mineral is shipped as a batch of concrete than in a typical load of gravel or sand, it will require **more** HGV movements, as will the need to import cement.
- The Transport Assessment indicates that the concrete plant alone will contribute 68 HGV movements a day.

Noise pollution

- Given the close proximity of site operations to houses, residents will suffer significant impact of noise from excavation works, running of conveyors, mineral processing plant and concrete plant and vehicle movements around the site.
- This will continue six days a week for up to five years, followed by four years of restoration.

Dust pollution

Although minerals will be processed whilst wet, piles are left to drain following extraction.

- During summer months, drying of exposed surfaces will result in dust. This will be carried on the prevailing wind directly to residential areas of Richings Park, with potential adverse consequences for health of vulnerable local residents and overall status of the local environment.

Air quality

The applicant's assessment of the impact on air quality focuses on locations in the Borough of Slough, distant from the site at Richings Park, and where any effects will be diluted.

- We can find no baseline measures in the application documentation of atmospheric pollutants in the vicinity of the site. Thus, no conclusions can be drawn on potential impact the development will have on the quality of life for residents, pedestrians or road users in Richings Park.
- Such assessment must include the additional impact of traffic flows of around 350% of the baseline figures quoted by the applicant during closure of Hollow Hill Lane.

Impact on traffic

The lvers are currently overwhelmed by traffic congestion and the huge number of HGV movements. North Park is a narrow rural road which is unclassified and not built or maintained for constant HGV use.

Appendix B of Appendix 4 estimates typical weekday two-way traffic flows (Nov/Dec 2015) of around 7,200 vehicles during the proposed working period (07:00-19:00) on this road of which around 1000 were HGVs.

Appendix 4, Section 6.7 (p24) indicates an increase of 306 vehicles per day during site operations, of which 242 would be HGVs. It concludes that traffic flows will increase “*by between 1.1% and 2.3%, equating to a negligible magnitude of change.*” But it also states that “*a greater forecast increase (between 10% and 20%) in numbers of heavy vehicles.*”

- These conclusions are inaccurate – they are based on **24 hour** traffic flows, whereas all of the site traffic will occur between **07:00-19:00**. Based on the applicant’s data, total traffic flow during operational periods will increase by 3.9% and HGV numbers by 23%.
- Since the applicant monitored traffic flow in 2015, the Link Park industrial site on Thorney Mill Road has become fully operational. More than 120 operator’s licences have been granted, resulting in at least another 240 HGV movements.
 - The HS2/Heathrow Express depot project has now received royal assent and will involve at least another 75 HGVs per day along North Park
 - Data published by Slough Borough Council show that two-way traffic flow along North Park increased to **350%** of pre-closure values following closure of Hollow Hill Lane.

Para 11.60 (p60) of the Planning Statement concludes that the scheme “*has the potential to provide the WRLtH scheme, HS2 and HEx with the aggregates and concrete that they requirereducing HGVs movements in the local area*”.

- No evidence is provided that the HS2/Hex depot and WRLtH projects would accept concrete produced by the plant. Indeed the engineers from the WRAtH project have specifically advised us that the concrete produced would not be suitable for their needs.

Safety of pedestrians

There is a ‘priority built-out’ or pinch point 35m to the east of the site access. (p 90 of Transport Assessment). The applicant states in the Transport Assessment that the queue length from this is typically reaches 11 vehicles and that this would not cross the access.

- This statement is totally inaccurate as can be seen from the attached photo and plan, where it is clear that only 3 queuing 16.6m HGVs would obstruct the entrance.

- The traffic data used to derive this conclusion is outdated and the conclusion therefore invalid.
- The footpath on the north side of North Park terminates at the bridge parapet, approximately 30 m west of the site entrance (see attached plan). Pedestrians must cross the road to the footpath on the south side at this point. There is no street lighting here to assist in dark winter mornings or afternoons.
- The applicant (Para 11.94; p70 of Planning Statement) concludes “*The potential effects of the development upon pedestrian delay and pedestrian amenity are considered to be insignificant.*”
- No assessment of pedestrian **safety** has been undertaken
- No consideration has been given to the risks to pedestrians crossing the road when vehicles are turning out of the site with vision restricted by queuing traffic into a line of traffic.

Loss of amenity

Whilst it is accepted that use of footpath IVE/15/1 has been constrained by demolition of the Dog Kennel bridge, nevertheless, it remains an amenity available to members of the public. Closure of the path would involve further loss of amenity for a decade.

The AECOL survey concludes that the area provides a habitat for foraging and potential roosting sites for bat populations (AECOL Survey 3; Para 4.3.6 (p25) & Section 13.2). This needs to be addressed as does the loss of habitat for other flora and fauna.

Conclusions

We recognise and understand the need to capitalise on mineral assets, but their exploitation is governed by strict guidelines, (cited by the applicant), that take into consideration factors such as the impact on local communities, the environment and traffic flows. The traffic volumes, excessive numbers of HGVs, noise and air pollution generated by the proposed quarry will significantly impact the environment and quality of life in Richings Park.

It is apparent that insufficient consideration has been given to the adverse effects of the proposed workings on quality of life for local residents, on other environmental considerations and traffic flows and safety of pedestrians and adequate mitigation has not been proposed.

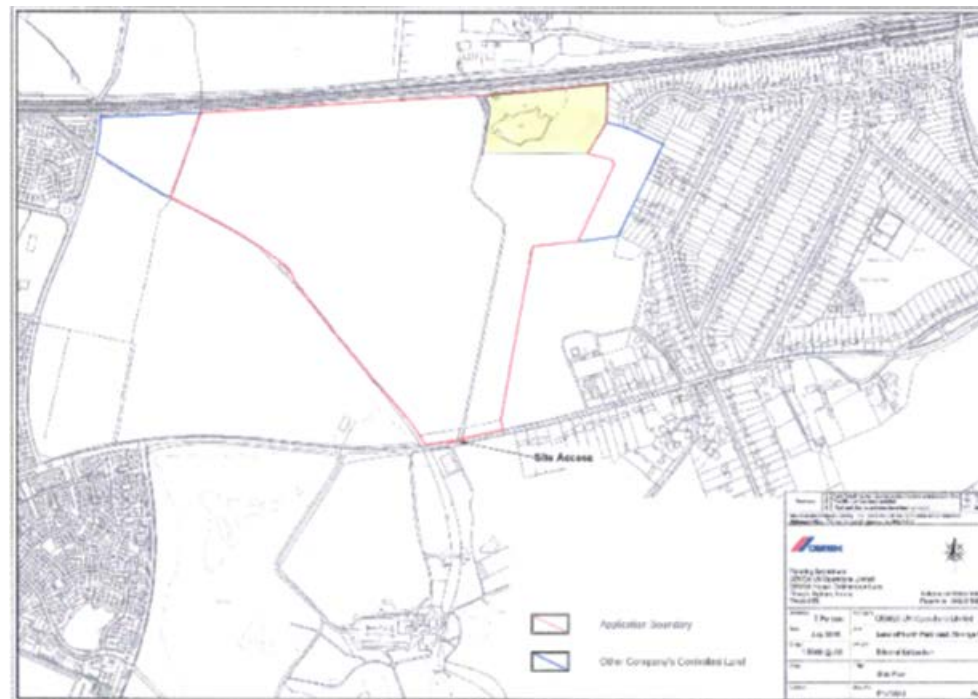
The proposal fails to meet the criteria for acceptable development.

On this basis, we strongly object to the proposal and urge the Committee reject it, particularly given the needs for the site boundary to the north-east of the site to be redefined in accordance with **Fig. 1** and the removal of the concrete plant from the application.

Should the Committee be minded to decide to grant approval, against the best interests of residents and the environment of Richings Park, then it should be subject to the following conditions, strictly enforced:

- Production of concrete is not permitted on the site.
- Conveyors to be enclosed in order to minimise noise and dust.
- Independent, comprehensive baseline measurements of air quality and dust levels in North Park and residential areas to be undertaken within a 500 metre radius of the site before works commence and during operation.
- Operational hours to be limited to weekdays only.
- Strict monitoring of the routes followed by HGVs associated with the operation to be undertaken in order to ensure that they use only the prescribed route.
- A full safety audit to be made on the impact of site operations on pedestrians and cyclists in North Park
- Adequate provision to be given for safeguarding pedestrians when crossing North Park.
- Improvements made to the wildlife habitat qualities of the hatched area of Fig 1 as part of Phase 1.
- Improved mitigation measures provided for the residents of Bathurst Walk

Fig 1. Proposed revision to boundaries on north-east section



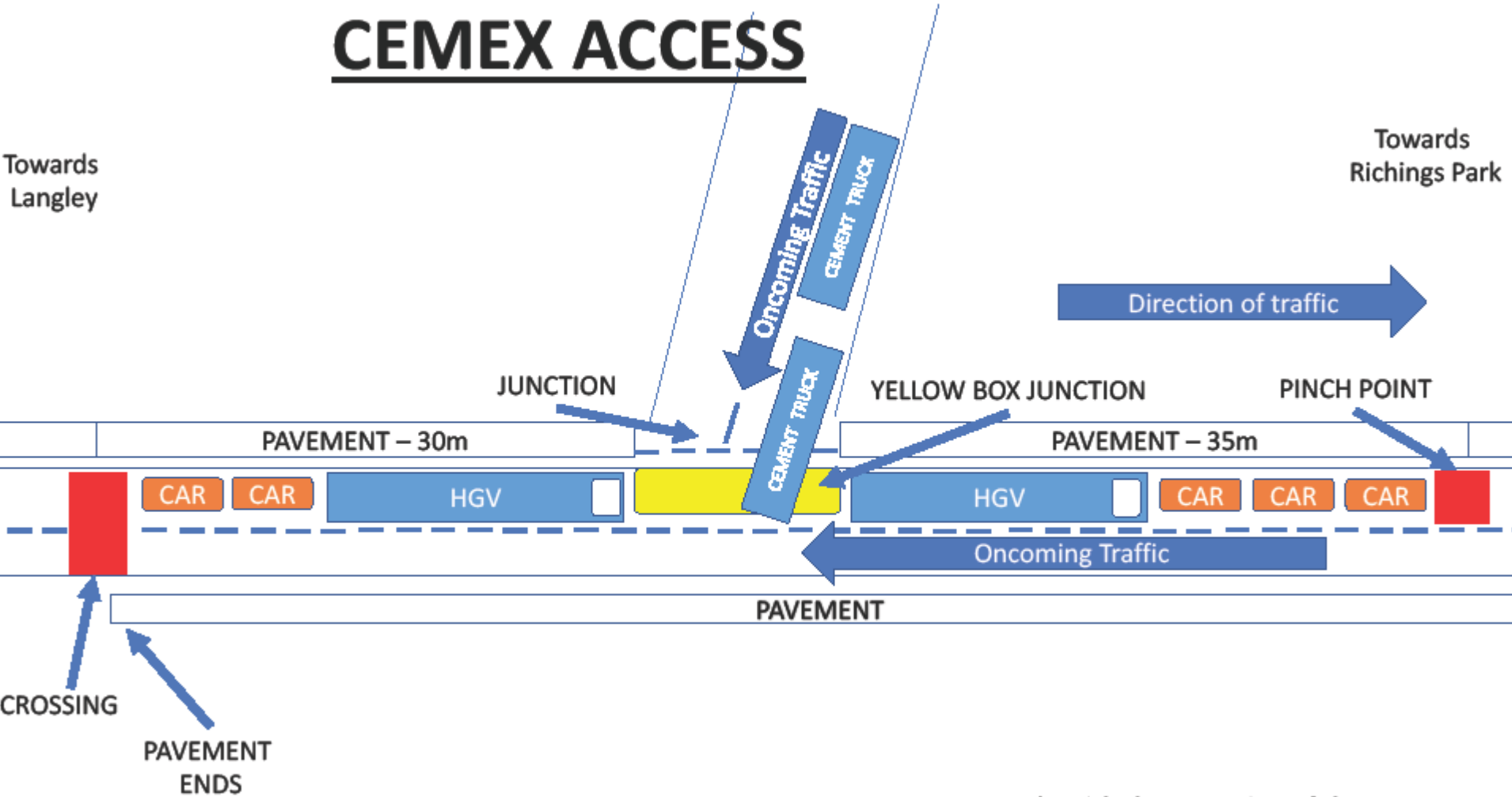
Area shaded yellow to be removed from the area for extraction of minerals.



CEMEX ACCESS

Towards Langley

Towards Richings Park



Notes: To scale with the exception of the Pavements